

**BERNSTEIN LITOWITZ BERGER  
& GROSSMANN LLP**

Salvatore Graziano (admitted *pro hac vice*)

salvatore@blbglaw.com

Abe Alexander (admitted *pro hac vice*)

abe.alexander@blbglaw.com

Stephen Boscolo (admitted *pro hac vice*)

stephen.boscolo@blbglaw.com

1251 Avenue of the Americas

New York, NY 10020

Tel: 212-554-1400

Fax: 212-554-1444

*-and-*

Jonathan D. Uslander (Bar No. 256898)

jonathanu@blbglaw.com

Lauren M. Cruz (Bar No. 299964)

lauren.cruz@blbglaw.com

Caitlin C. Bozman (Bar No. 343721)

caitlin.bozman@blbglaw.com

2121 Avenue of the Stars, Suite 2575

Los Angeles, CA 90067

Tel: (310) 819-3470

*Lead Counsel for Lead Plaintiff Indiana*

*Public Retirement System and the Class*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

JONNIE HOMYK, et al.,

Plaintiffs,

v.

CHEMOCENTRYX, INC. et al.,

Defendants.

Master File No. 4:21-cv-03343-JST *and  
related case*, No. 4:21-cv-04357

**DECLARATION OF JEFFREY M. GILL  
IN SUPPORT OF LEAD PLAINTIFF'S  
MOTION FOR CLASS  
CERTIFICATION AND  
APPOINTMENT OF CLASS  
REPRESENTATIVE AND CLASS  
COUNSEL**

Judge: Honorable Jon S. Tigar

1 I, Jeffrey M. Gill, hereby state as follows:

2 1. I, Jeffrey M. Gill, respectfully submit this declaration in support of Lead Plaintiff  
3 Indiana Public Retirement System (“Indiana”) Motion for Class Certification and Appointment  
4 of Class Representatives and Class Counsel. I have personal knowledge of the statements herein  
5 and, if called upon as a witness, could and would competently testify thereto.

6 2. I am the General Counsel of Indiana and am authorized to make this declaration  
7 on behalf of Indiana. Indiana is a pension fund operated for the benefit of over 517,000 members  
8 and retirees of public universities, schools, municipalities, and state agencies of the State of  
9 Indiana. As of fiscal year-end 2022, Indiana had approximately \$42.4 billion in assets under  
10 management and is among the largest 100 pension funds in the United States. As reflected in its  
11 certification filed with the Court (ECF No. 18-2), Indiana purchased shares of ChemoCentryx  
12 common stock during the Class Period and suffered damages as a result of the violations of the  
13 federal securities laws alleged in this Complaint.

14 3. Indiana understands that the Private Securities Litigation Reform Act of 1995  
15 (“PSLRA”) was intended to encourage institutional investors and others with meaningful losses  
16 to direct securities class actions. As Lead Plaintiff and proposed Class Representative, Indiana, a  
17 sophisticated institutional investor, has been and will continue to be committed to vigorously  
18 prosecuting this litigation. Indiana intends to obtain the largest recovery for the proposed Class  
19 consistent with good faith and sound judgment.

20 4. Indiana has diligently pursued the effective prosecution of this Action and has  
21 actively monitored its progress. Among other things, it authorized the filing of the motion  
22 seeking to be appointed Lead Plaintiff; reviewed the complaint and various other pleadings filed  
23 in this action; propounded document discovery and third-party subpoenas; responded to  
24 document discovery; and communicated with counsel regarding the case, including litigation  
25 strategy and significant developments in the litigation. As Class representative, Indiana would  
26 continue to diligently pursue the effective prosecution of the Action.

27 5. Indiana understands that it owes a fiduciary duty to all members of the proposed  
28 Class it represents to provide fair and adequate representation and would continue to work

1 actively to prosecute this Action in the interests of the Class members it represents and to try to  
2 obtain the best outcome for them, consistent with good faith and meritorious advocacy.

3 6. Indiana seeks appointment of Bernstein Litowitz Berger & Grossmann LLP  
4 (“Bernstein Litowitz”) as Class Counsel for the proposed Class based on its substantial  
5 experience and expertise in prosecuting securities class actions. Indiana believes that Bernstein  
6 Litowitz possesses the necessary experience and financial and human resources to prosecute this  
7 case vigorously and effectively on behalf of the proposed Class.

8 7. Indiana understands that its service as Class Representative does not entitle it to  
9 any benefits not enjoyed by the rest of the Class beyond that which is provided by the PSLRA.  
10 If there is a recovery in this case, Indiana does not expect to receive any more than its pro-rata  
11 shares of the amount recovered.

12 I declare under the penalty of perjury under the laws of the United States of America that  
13 the foregoing is true and correct, and that I have authority to execute this declaration on behalf of  
14 Indiana. Executed on this 17<sup>th</sup> day of August 2023.

15  
16 DocuSigned by:  
*Jeffrey M. Gill*  
17 Jeffrey M. Gill